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FAA-02-13378-3739

Department Management System  
27, 2002

U.S. Department of Transportation, Room Plaza 401  
400 Seventh Street, SW  
Washington, DC 20590-0001

December

DEPT. OF TRANSPORTATION  
DOCKET

Re: Docket No. FAA-2002-13378

03 JAN 10 PM 3:12

Dear Sirs:

I am writing to comment on the proposed FAA regulations on the shipping of pet animals and birds. There are several issues of serious concern:

1. The proposed regulation would require a burdensome amount of paperwork by airline employees which would increase airline costs and eventually increase the cost of transportation of pet animals, which already exceeds normal cargo costs.
2. The proposed rule is poorly drafted and does not really address animal welfare, since the rulemakers failed to take into consideration the recommendations of those more expert in animal care, namely the American Veterinary Medical Association.
3. The original law was drafted to cover dogs and cats, yet the proposed regulation has been extended to cover any "warm or cold blooded animal".
4. The proposed regulations would require airlines transporting animals and experiencing a 'reportable incident', to include in their report the name and address of the person making a complaint. This means the animal owner or breeder's personal data would become a part of public record and accessible to harassment by those who are against animal ownership, the animal rights fanatics.
5. The proposed regulations use the term "animal guardian" instead of "animal owner". Using the term animal guardian in a federal regulation provides a means for animal rights organizations to gain precedence in the use of the term. The term "guardian" reduces the control of the animal owner, as it changes the legal relationship between the animal and the owner.

Sincerely,

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